

IN THE DISTRICT COURT OF THE UNITED STATES
for the Western District of New York

NOVEMBER 2012 GRAND JURY
(Impaneled 11/09/2012)

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

STEVEN BENNETT a/k/a Stevo

(Counts 1, 2),

CHANDRA WOODS

(Count 1),

JESSICA LOPEZ

(Counts 1, 2),

PHILLIP KEOMONGKOUN a/k/a Chino

(Count 1),

MALCOLM BULL

(Count 1),

NIKKI LILLARD

(Count 1),

GUY BURT a/k/a LAMAR

(Count 1)

Violations:

Title 21, United States Code, Section 846;

Title 18, United States Code, Section

1956(h)

(2 Counts and 2 Forfeiture Allegations)

COUNT 1

**(Conspiracy to Possess with Intent to Distribute,
and to Distribute, Methamphetamine and Cocaine)**

The Grand Jury Charges That:

Between in or about July 2012, the exact date being unknown,
and on or about the date of the return of this Indictment, in the
Western District of New York, and elsewhere, the defendants, **STEVEN
BENNETT a/k/a Stevo, CHANDRA WOODS, JESSICA LOPEZ, PHILLIP
KEOMONGKOUN a/k/a Chino, MALCOLM BULL, NIKKI LILLARD, and GUY BURT**

a/k/a LAMAR, did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to commit the following offenses, that is, to possess with intent to distribute, and to distribute, 50 grams or more of methamphetamine, a Schedule II controlled substance, and 500 grams or more of a mixture and substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 841(b)(1)(B).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Money Laundering Conspiracy)

The Grand Jury Further Charges That:

Between in or about July 2012, the exact date being unknown, and on or about the date of the return of this Indictment, in the Western District of New York, and elsewhere, the defendants, **STEVEN BENNETT a/k/a Stevo** and **JESSICA LOPEZ**, did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to commit the following offenses, namely, to knowingly conduct financial transactions affecting interstate commerce, that is, the deposit and withdrawal of monetary instruments, namely, United States currency, by, through and to Bank of America, a financial institution engaged in and the activities of which affected interstate commerce, which involved

the proceeds of specified unlawful activity, that is, the unlawful distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to do so, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole and in part to avoid a transaction reporting requirement under Federal law, namely, the transaction reporting requirements as set forth in Title 31, United States Code, Section 5313 and the regulations promulgated thereunder, including Title 31, Code of Federal Regulations, Section 1010.311, and knowing that the property involved in such financial transactions, namely, the said United States currency, represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

All in violation of Title 18, United States Code, Section 1956(h).

FIRST FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon their conviction of Count 1 of this Indictment, the defendants, **STEVEN BENNETT a/k/a Stevo, CHANDRA WOODS, JESSICA LOPEZ, PHILLIP KEOMONGKOUN a/k/a Chino, MALCOLM BULL, NIKKI LILLARD,** and **GUY BURT a/k/a LAMAR,** shall forfeit all of their interest in any and all property, real or personal, constituting or

derived from any proceeds the person obtained, directly or indirectly, as the result of such violation.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above property.

All pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(p).

SECOND FORFEITURE ALLEGATION

The Grand Jury Further Alleges That:

Upon their conviction of Count 2 of this Indictment, the defendants, **STEVEN BENNETT a/k/a Stevo** and **JESSICA LOPEZ**, shall forfeit all of their interest in any and all property, real or personal, involved in such offense, or traceable to such property, including but not limited to the following:

CURRENCY

- a. The sum of THREE HUNDRED EIGHTY-TWO THOUSAND TWO HUNDRED FIFTY (\$382,250.00) dollars United States currency, said amount if not found then a monetary judgment reflecting this amount.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above property.

All pursuant to Title 18, United States Code, Section 982(a)(1) and Title 21, United States Code, Section 853(p).

DATED: Buffalo, New York, January 16, 2013.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

S/FOREPERSON
FOREPERSON